2:48 PM 02/01/2002I am an Extra Class license holding and have been licensed since 1945. I am particularly interested in the bands above 50 MHZ. I am presently active on all amateur bands from 50 MHZ through 2304 MHZ. For 18 years, I authored the QST column, "The World Above 50 MHZ".

I wish, in the strongest terms, to express my concern over the Commission's intention to permit RF Identification Devices (RFIDs) to operate under the conditions proposed in the Docket. Such increase in permitted field strength and duty cycle for these devices poses a major threat to weak signal work around 432 MHZ as well as satellite operation at 435 MHZ and above. I wonder why is it always the amateur allocations which come in for such treatment? Amateur Radio is, after all, a licensed service. If it must be an amateur allocation, why must it be in a part of the particular band which is most susceptible to interference, i.e. the portions where weak signal work is pursued? The argument that the U.S. must follow the lead of other nations and trash these sensitive bands is ridiculous. Merely because other nations make a mistake, should the U.S. follow? Wouldn't it be better for us to set an example to the rest of the world and place these devices in parts of the spectrum where they pose little or no threat of destructive interference. The bands already in use for RF heating devices such as microwave ovens would seem to be an appropriate place for equipment operating at the field strengths being proposed.

It is a fallacious argument to claim that RFIDs operating as proposed, do not threaten amateur operation. If it were to be mandated that they be used only at industrial sites, warehouse complexes and transportation terminals, that contention might hold some promise of being true. But, no such limitations are proposed. Thus, it is not beyond the realm of possibility that RFIDs will be widely used by delivery companies and be operated frequently on trucks in residential neighborhoods where amateur operation is generally conducted.

It is understood that such devices have been operating for some time at military installations in the U.S. This fact may be used by the proponents to claim that the devices pose no threat to amateur operation. This too, is a fallacious argument. Most military installations are in areas relatively far removed from

residential
neighborhoods. Thus, citing operation of RFIDs at such sites is no basis for claiming
that their unrestricted operation poses no threat to amateur operation.

One wonders if the manufactures of this equipment have explored alternatives other
than the use of higher power transmitting devices. Would it not be better to improve
the sensitivity of their receivers before screaming for higher power authority?
In addition to reducing potential interference, it is probably less expensive.

I urge the Commission not to authorize RFIDs to operate at the proposed levels on
433 MHZ or on any other amateur frequencies not already allocated in this country for
microwave ovens and similar devices.

Respectfully submitted:

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